

**GOODWIN, PROCTER & HOAR**  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
COUNSELLORS AT LAW  
EXCHANGE PLACE  
BOSTON, MASSACHUSETTS 02109-2881

JEFFREY C. BATES  
(617) 570-1499

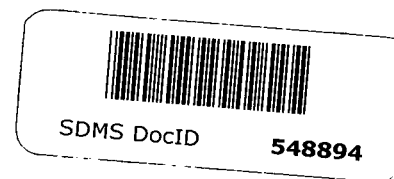
SUPERFUND RECORDS CTR	
Site:	<i>Wells G &amp; H</i>
Break:	<i>17.9</i>
Other:	<i>548894</i>

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CABLE • GOODPROCT BOSTON

June 27, 1994

BY HAND

M. Gretchen Muench  
Assistant Regional Counsel  
United States Environmental  
Protection Agency Region I  
One Congress Street  
Boston, MA 02203-2211



Dear Gretchen:

On behalf of UniFirst Corporation, and in accordance with Paragraph 59 of the Wells G & H Consent Decree, I write to give EPA notice of the existence of a dispute which requires resolution under the provisions of Section XX of the Wells G & H Site Consent Decree.

Mary Garren's June 13, 1994 letter, addressed to Jeffrey Lawson as UniFirst's project coordinator and delivered to him at a June 13 meeting, directed UniFirst to "cease all field work at the site associated with the investigation of the unconsolidated deposits" and, within fourteen days, to "submit a work plan proposing dynamic tests, such as field-scale in-situ permeability tests and the use of multi-level probes to identify the nature of vapor migration at the site." UniFirst was further directed to submit "within thirty (30) days of completion of the permeability test, a work plan detailing a feasibility study, namely, a pilot test, that examines the time versus effectiveness for remediation of these unconsolidated deposits using SVE [soil vapor extraction]." UniFirst hereby gives notice that it disputes the lawfulness, timing, appropriateness, necessity and reasonableness of assertions and directives contained in the June 13, 1994 letter.

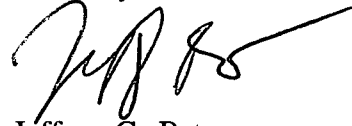
UniFirst welcomes the opportunity to meet with EPA representatives informally within the next twenty days to attempt to resolve this dispute. If that process is unsuccessful,

GOODWIN, PROCTER & HOAR

M. Gretchen Muench  
June 27, 1994  
Page 2

we understand that EPA's written position statement will be issued no later than thirty-four days from today, on August 1, 1994, unless extended by agreement.

Sincerely,

A handwritten signature in black ink, appearing to read 'JCB', with a long horizontal flourish extending to the right.

Jeffrey C. Bates

JCB:pah

cc: Paula Fitzsimmons, Esq.  
Ms. Mary Garren  
Mr. Gary E. Augustyn  
Deirdre C. Menoyo, Esq.  
Mr. Jeffrey T. Lawson

62670.b1

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY

REGION I

J.F.KENNEDY FEDERAL BUILDING, BOSTON, MA. 02203

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FACSIMILE COVER SHEET

TO: Mary Garren

OFFICE: EPA Canal St

PHONE: \_\_\_\_\_

TELECOPIER: \_\_\_\_\_

CONFIRMING: \_\_\_\_\_

FROM: Gretchen Mwendu

OFFICE: Office of Regional Counsel, Region I

PHONE: 617 ~~63~~ 565 4904

TELECOPIER: 617-565-3335 or 617-565-1141

NUMBER OF PAGES: 2

MESSAGE: \_\_\_\_\_

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